

February 27, 2019

VIA IBFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Space Exploration Holdings, IBFS File No. SAT-MOD-20181108-00083

Dear Ms. Dortch:

Planet Labs Inc. (“Planet Labs”) respectfully requests that the International Bureau (“Bureau”) change the *ex parte* status of the above-captioned proceeding from “restricted” to “permit-but-disclose.”¹ Designating the proceeding as permit-but-disclose will serve the public interest by facilitating communications, allowing the Bureau to develop a more complete record and reach a more informed decision. Additionally, designating the SpaceX proceeding as permit-but-disclose would be consistent with the Bureau’s treatment of other applications and market access requests for the same frequencies.²

Planet Labs through its counsel has contacted the parties to this proceeding or counsel to the parties and received no objection to the request.

Please direct any questions regarding this letter to the undersigned.

Respectfully submitted,

/s/ Tony Lin

Tony Lin
Counsel for Planet Labs Inc.

cc: (via email)
Stephen Duall

¹ See 47 C.F.R. §§ 1.1200(a) (“Where the public interest so requires in a particular proceeding, the Commission and its staff retain the discretion to modify the applicable *ex parte* rules by order, letter, or public notice.”); see also 47 C.F.R. §§ 1.1206 and 1.1208 note 2.

² See, e.g., *Applications Accepted for Filing: Cut-off Established for Additional NGSO-like Satellite Applications or Petitions for Operations in the 12.75-13.25 GHz, 13.85-14.0 GHz, 18.6-18.8 GHz, 19.3-20.2 GHz, and 29.1-29.5 GHz Bands*, Public Notice, 32 FCC Rcd 4180, 4183 (IB 2017) (designating the *ex parte* status of all of the applications and market access requests in the processing round as permit-but-disclose will “provide for uniformity of treatment”).

CERTIFICATE OF SERVICE

I, J. Ryan Thompson, hereby certify that on February 27, 2019, a true and correct copy of this letter was sent by United States mail, first class postage prepaid, to the following:

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/s/ Ryan Thompson

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